



April 12, 2002

Ms. Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

**Re: CC Docket No. 94-102 / Quarterly TTY Implementation Report  
Horizon Personal Communications, Inc.  
Broadband PCS Station KNLF580  
BTA080 C1 – Chillicothe, Ohio**

Dear Ms. Salas:

Horizon Personal Communications, Inc. ("Horizon") hereby submits its April 2002 quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000.

Horizon has chosen CDMA technology for its broadband PCS system because it has entered into an affiliation arrangement with Sprint PCS. Horizon therefore intends to deploy a TTY technical solution that is identical to that deployed by Sprint PCS. In this regard, Horizon's infrastructure in the Chillicothe BTA consists of Motorola base stations and Nortel switching. We have recently learned from Sprint PCS that it has encountered problems during testing of Motorola's TTY software, resulting in high character error rates. Sprint PCS reports that it is working closely with Motorola to resolve this problem, and that it is due to receive another software patch on or about April 15<sup>th</sup>. However, due to these problems, Sprint PCS has had to modify its field integration testing and user trial dates for the Motorola TTY solution. If Sprint PCS should continue to experience unacceptably high error rates with the new patch, Horizon will be unable to proceed with implementation and we may be forced to delay our TTY launch in the Chillicothe BTA. Sprint PCS will be providing the FCC with additional information about its deployment and testing of TTY software and handsets in conjunction with the TTY Forum.

In Horizon's previous quarterly report, dated December 28, 2001, we noted that, despite our best efforts, we were unable to meet the December 31, 2001 deadline by which carriers operating digital wireless systems should have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices, as specified in the *Fourth Report and Order*. Therefore, we requested a waiver of the December 31, 2001 requirement, to the extent deemed necessary by the Commission..

Horizon is encouraged by the progress that Nortel and Motorola have made in developing a TTY solution for their CDMA customers and looks forward to the results of field integration testing and user trials by Sprint PCS. However, because Horizon is a small carrier, it does not have the resources to obtain network software and infrastructure equipment before it has been fully tested and it is commercially available to all carriers. Nevertheless, Horizon will make every effort to implement TTY capability in its market by the June 30, 2002 deadline.

Respectfully Submitted,

  

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William A. McKell  
President and CEO

**Horizon Personal Communications, Inc.**  
**E911 TTY Device Capability Report for April, 2002**

**I. DEVELOPMENT ACTIVITIES**

**Network Infrastructure Software Development** – Horizon has chosen CDMA technology for its broadband PCS system because it has entered into an affiliation arrangement with Sprint PCS. Our infrastructure in the Chillicothe BTA consists of Motorola base stations and Nortel switching.

It is our understanding that Sprint PCS has encountered problems during its testing of Motorola's TTY software, resulting in high character error rates. Sprint PCS has reported that it is working closely with Motorola to resolve this problem, and that it is due to receive another software patch on or about April 15<sup>th</sup>. However, due to these problems, Sprint PCS has had to modify its field integration testing and user trial dates for the Motorola TTY solution. If Sprint PCS should continue to experience unacceptably high error rates with the new software, Horizon may be forced to delay its TTY launch in the Chillicothe BTA. We will continue to monitor infrastructure software development activities by Sprint PCS.

- 1) **Handset Development and Testing Plans** – We are following the CDMA handset development and interoperability testing that is being performed by Sprint PCS. We are working with our suppliers to acquire these units as soon as possible.
- 2) **Beta Testing and Lab Testing** – Horizon is a small carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, Horizon will test the equipment it procures as soon as it is available, to make sure it meets the manufacturer's specifications.
- 3) **Release and General Availability to Carriers of Network Infrastructure Software** – See answer to #1, above. We also direct the Commission's attention to recent TTY status report filed by Sprint PCS, which we understand will be included in the April 2002 report in CC Docket No. 94-102 by ATIS/TTY Forum.
- 4) **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
- 5) **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – Dependent on handset vendors for enhanced TTY devices.
- 6) **Carrier Coordination of Testing with PSAP** – Horizon will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.

- 7) **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed.
- 8) **Retail Availability of Necessary Consumer Equipment** – Retail availability will be implemented by Horizon when compatible handsets are ready for rollout.
- 9) **Geographic Scope of Network Infrastructure Deployment** – Since our network has only one switch, as hardware become available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.